

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

KAIFI LLC,

Plaintiff,

v.

VERIZON COMMUNICATIONS INC., et al,

Defendants.

Case No. 2:20-CV-280-JRG

JURY TRIAL DEMANDED

Honorable Rodney Gilstrap

P.R. 4-3 JOINT CLAIM CONSTRUCTION AND PREHEARING STATEMENT

Plaintiff KAIFI LLC (“KAIFI”) and Defendants Verizon Communications Inc.; Cellco Partnership D/B/A Verizon Wireless; Verizon Services Corp.; Verizon Enterprise Solutions LLC; Verizon Business Global LLC; Verizon Business Network Service LLC; Verizon Corporate Services Group Inc.; Verizon Data Services LLC; Verizon Media Inc.; and Verizon Online LLC. (collectively, “Verizon” or “Defendants”) hereby submit their Joint Claim Construction and Prehearing Statement regarding U.S. Patent No. 6,922,728 (“728 Patent”).

1. P.R. 4-3(a)(1) – Agreed Upon Constructions

The parties agree on the following construction of claim terms, phrases or clauses:

Claim Term, Phrase or Clause	Parties’ Agreed Upon Construction
“outdoor wireless internet network” (all asserted claims)	“a wireless network that provides a different network path to internet connectivity than the indoor network”
“location register” (all asserted claims)	“register that records the location of the data communication terminal”
“indoor system ID information” (all asserted claims)	“information uniquely identifying the indoor network”
“location information” (all asserted claims)	“information on a locational area or indoor system ID information or both”
“provides roaming of the voice/data signals provided to the user” (claim 1)	“provides switching the network path of the voice/data communications automatically and without interruption”

In addition, pursuant to the The Joint Motion To Consolidate Claim Construction Hearings And To Amend DCO For Claim Construction Briefing filed by the parties on May 6, 2021 (Dkt. 52), the parties agree that for the seven terms currently disputed in *KAIFI LLC v. T-Mobile US, Inc.*, Case No. 2:20-CV-281-JRG (“T-Mobile Action”) the claim constructions issued by the Court in the T-Mobile Action will be applicable in *KAIFI LLC v. Verizon Communications Inc. et al.*, Case No. 2:20-CV-00280-JRG (“Verizon Action”).

2. P.R. 4-3(a)(2) – Each Party’s Proposed Constructions

The parties attach a chart hereto as Appendix 1, which shows each party’s proposed construction of each disputed claim term, phrase, or clause, together with an identification of all references from the specification or prosecution history that support that construction, and an identification of any extrinsic evidence known to the party on which it intends to rely either to support its proposed construction or to oppose any other party’s proposed construction, including but not limited to, as permitted by law, dictionary definitions, citations to learned treatises and prior art, and testimony of percipient and expert witnesses.

3. P.R. 4-3(a)(3) – Anticipated Time for Hearing

The parties anticipate a combined total of 3.5 hours for presentation at the hearing.

4. P.R. 4-3(a)(4) – Witness Testimony at Hearing

The parties do not anticipate calling any witnesses at the hearing.

5. P.R. 4-3(a)(5) – Other Issues for a Prehearing Conference

The parties are unaware of any issues that would be appropriate for a prehearing conference.

Date: May 10, 2021

Respectfully submitted,

/s/ Robert Christopher Bunt
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CERTIFICATE OF SERVICE

I certify that the foregoing document was filed electronically on May 10, 2021 pursuant to Local Rule CV-5(a) and has been served on all counsel who have consented to electronic service.

/s/ Robert Christopher Bunt _____
Robert Christopher Bunt